

EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
HECTOR MADRID,

Plaintiff,

- against -

PROGRESO LATINO GROCERY INC., PROGRESO
HONDURAS RESTAURANT INC., PROGRESO DELI
& GROCERY, INC., and any other entities affiliated with
or controlled by PROGRESO LATINO GROCERY INC.,
PROGRESO HONDURAS RESTAURANT INC.,
PROGRESO DELI & GROCERY, INC., and DENIS PAZ
individually,

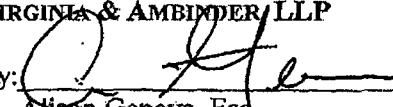
Defendants.

14-cv-5891 (ENV)

**STIPULATION AND ORDER
OF DISMISSAL WITH
PREJUDICE**

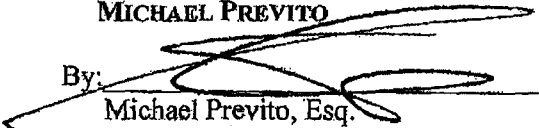
IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel
for Plaintiff and Defendants in the above captioned action, that, in accordance with Rule 41 of the
Federal Rules of Civil Procedure, the action be dismissed, with prejudice and without costs or
attorneys' fees to any party, as to Plaintiff or Defendants.

VIRGINIA & AMBINDER LLP

By: 
Alison Genova, Esq.
40 Broad Street, 7th Floor
New York, New York 10004
Tel (212) 943-9080
Attorneys for Plaintiff
July 2, 2015

SO ORDERED
s/ENV

MICHAEL PREVITO

By: 
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6 Lyndon Lane
Centerreach, New York 11720
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Attorneys for Defendants
July, 2015

the Court is directed to take the case.

AUG -11 2015



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July 13, 2015

VIA ECF

Hon. Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Hector Madrid v. Progreso Latino Grocery, Inc., et al.*,
Case No. 14-CV-05891 (ENV) (SMG)

Dear Judge Gold:

This firm is legal counsel to the Plaintiff in the above referenced litigation. I write on behalf of both parties to respectfully advise this Court that the parties have reached an agreement in this matter. The settlement documents have been fully executed by the parties. As per Your Honor's individual rules of practice, a stipulation of discontinuance will be filed with the Court.

Should Your Honor wish to further discuss the settlement, the parties will make themselves available for a telephonic or in-person conference.

Respectfully submitted,

/s/ Alison L. Genova

cc: Michael L. Previto (via email and ECF)
Lloyd R. Ambinder (via email and ECF)